

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JONATHAN GAVRIELOF,

Defendant.

**SEALED SUPERSEDING INDICTMENT**

S2 23 Cr. 110 (MKV)

**COUNT ONE**

**(Conspiracy to Defraud the United States)**

The Grand Jury charges:

1. From at least in or about 2017 through at least in or about 2023, in the Southern District of New York and elsewhere, JONATHAN GAVRIELOF, the defendant, and others known and unknown, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to defraud the United States and its agencies by impeding, impairing, and defeating the lawful functions of the United States Food and Drug Administration to protect the health and safety of the public by ensuring that prescription drugs distributed in the United States are safe and effective from the time of manufacturing to the time they are delivered to patients.

2. It was a part and object of the conspiracy that JONATHAN GAVRIELOF, the defendant, and others known and unknown, would and did intentionally and knowingly impede, impair, and defeat the lawful functions of the United States Food and Drug Administration by engaging in the unlawful distribution and dispensation of diverted, black-market HIV medication, obstructing the Food and Drug Administration's effort to ensure patient safety and secure the prescription drug supply chain against counterfeit, diverted, adulterated and misbranded

prescription drugs.

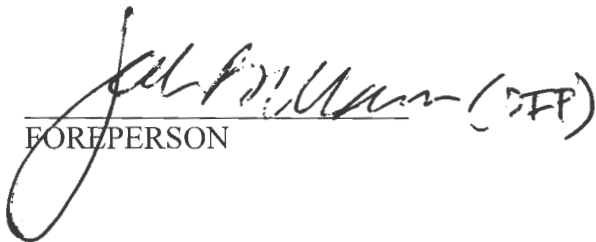
Overt Acts

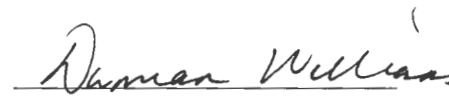
3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about July 22, 2021, BORIS AMINOV and JONATHAN GAVRIELOF, the defendants, exchanged text messages regarding purchasing and selling black-market HIV medication.

b. On or about December 24, 2021, BORIS AMINOV and JONATHAN GAVRIELOF, the defendants, exchanged text messages regarding how much it would cost for GAVRIELOF to obtain black-market HIV medication from one of GAVRIELOF's black-market sources.

(Title 18, United States Code, Section 371.)

  
FOREPERSON

  
DAMIAN WILLIAMS  
United States Attorney